

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION**

YOLANDA IRVING, et al.,

Plaintiffs,

v.

THE CITY OF RALEIGH, et al.,

Defendants.

5:22:CV-0068-BO

**JOINT MOTION FOR PROTECTIVE ORDER RELATED TO EXPUNGED
RECORDS OF NON PARTIES**

The parties, through counsel, move the Court pursuant to Local Civil Rule 7.1 and Rule 26(c) of the Federal Rules of Civil Procedure for entry of a Consent Protective Order to permit the release of expunged records of non-parties. In support of this motion, the parties show unto the Court the following:

1. The parties are currently engaged in discovery in this matter, with a deadline to complete all discovery by February 1, 2023.
2. Plaintiffs' counsel issued document requests seeking records from Defendants related to individuals arrested in transactions involving Dennis Williams, a confidential informant managed by Officer Omar Abdullah.
3. Six of these individuals received expungements of their criminal records by North Carolina courts, including records held by the Raleigh Police Department, State Bureau of Investigation, NC Administrative Office of the Courts.

4. The City of Raleigh currently possesses records related to these individuals and, except for the expungement orders, the City of Raleigh has indicated that it would provide certain records concerning the six individuals.
5. Plaintiffs notified 5 of these individuals by letter on November 23, 2022, that it sought access to their expunged records.
6. The City notified the 6th individual by letter on November 23, 2022.
7. Each letter notice advised those individuals that they could submit objections to the Court within twenty-one (21) days.

WHEREFORE, the parties respectfully request that the Court enter the proposed consent protective related to the expunged records of non parties.

Respectfully submitted, this the 5th day of December 2022.

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THIS the 5th day of December 2022

/s/Elizabeth G. Simpson